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*Attorneys for Defendants
Access International Advisors LLC,
Access International Advisors Ltd.,
Access Management Luxembourg SA,
Access Partners SA, Patrick Littaye,
Claudine Magon de la Villehuchet, and
Groupement Financier Ltd.*

Hearing Date: September 14,
2022 at 10:00 a.m. (ET)

Opposition Date: June 17, 2022

Reply Date: July 29, 2022

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,)	
Plaintiff-Applicant,)	Adv. Pro. No. 08-01789 (CGM)
v.)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	SIPA Liquidation
Defendant.)	(Substantively Consolidated)
In re:)	
BERNARD L. MADOFF,)	
Debtor.)	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,)	
Plaintiff,)	Adv. Pro. No. 10-04285 (CGM)
v.)	
UBS AG, UBS EUROPE SE (f/k/a UBS (LUXEMBOURG) SA), UBS FUND SERVICES (LUXEMBOURG) SA, UBS THIRD PARTY MANAGEMENT COMPANY SA, ACCESS INTERNATIONAL ADVISORS LLC, ACCESS INTERNATIONAL ADVISORS LTD., ACCESS MANAGEMENT LUXEMBOURG SA (f/k/a ACCESS INTERNATIONAL ADVISORS (LUXEMBOURG) SA) as represented by its)	ORAL ARGUMENT REQUESTED

Liquidator MAÎTRE FERNAND)
ENTRINGER, ACCESS PARTNERS SA as)
represented by its Liquidator MAÎTRE)
FERNAND ENTRINGER, PATRICK)
LITTAYE, CLAUDINE MAGON DE LA)
VILLEHUCHET (a/k/a CLAUDINE DE LA)
VILLEHUCHET) in her capacity as)
Executrix under the Will of THIERRY)
MAGON DE LA VILLEHUCHET (a/k/a)
RENE THIERRY DE LA VILLEHUCHET),)
CLAUDINE MAGON DE LA)
VILLEHUCHET (a/k/a CLAUDINE DE LA)
VILLEHUCHET) individually as the sole)
beneficiary under the Will of THIERRY)
MAGON DE LA VILLEHUCHET (a/k/a)
RENE THIERRY DE LA VILLEHUCHET),)
PIERRE DELANDMETER, THEODORE)
DUMBAULD, LUXALPHA SICAV as)
represented by its Liquidators MAÎTRE)
ALAIN RUKAVINA and PAUL)
LAPLUME, MAÎTRE ALAIN RUKAVINA)
AND PAUL LAPLUME, in their capacities)
as liquidators and representatives of)
LUXALPHA, GROUPEMENT FINANCIER)
LTD.,)
)
)
Defendants.)
)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon Defendants Access International Advisors LLC, Access International Advisors Ltd., Access Management Luxembourg SA, Access Partners SA, Patrick Littaye, Claudine Magon de la Villehuchet, and Groupement Financier Ltd.’s (collectively, “Defendants”) Memorandum of Law in Support of Its Motion to Dismiss, the accompanying Declaration of Patrick Littaye, dated April 22, 2022, and the exhibits thereto, the Second Amended Complaint, dated February 28, 2022 (the “SAC”), filed by plaintiff Irving H. Picard, Trustee (the “Trustee”) for the Liquidation of Bernard L. Madoff Investment Securities LLC, in the above-captioned adversary proceeding, and all prior pleadings and proceedings herein, Defendants move

for an order dismissing the claims asserted against them in the SAC pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(6), and 9(b) as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order in this proceeding entered March 8, 2022, the Trustee shall respond to this motion by June 17, 2022. If the Trustee responds to the motion, Defendants shall file their reply by July 29, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendants do not consent to the entry of final orders or judgment by this Court.

Dated: April 22, 2022
New York, New York

/s/ Anthony Paccione

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Access International Advisors LLC,

Access International Advisors Ltd.,

Access Management Luxembourg SA,

Access Partners SA, Patrick Littaye,

Claudine Magon de la Villehuchet (in her

capacities set forth in the caption above), and

Groupement Financier Ltd.